

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY; et al.,

Defendants.

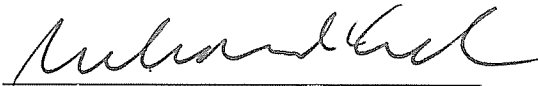
Civil Action No. 04-343-JJF

RULE 7.1.1 CERTIFICATION

The undersigned counsel certifies, pursuant to Local Rule 7.1.1, that LPL's counsel conferred with Tatung's counsel in an effort to agree to enlarge the time for LPL to file its Answering Brief. While consenting generally to the extension of time, Tatung's counsel insisted on extending the deadline to a date certain. Because the process before the Special Discovery Master is just beginning, because the parties have little control over the Special Discovery Master's calendar, and because the history of this case demonstrates that obtaining any ordered discovery from the Tatung Defendants will continue to be problematic, LPL believes that setting the deadline at a definite point after the completion of discovery makes more sense than an arbitrary date certain that may need to be extended repeatedly.

March 4, 2005

THE BAYARD FIRM



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